

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Our File: 39,574-0

In Re:

MAUREEN A. DEVINE,

Debtor.

Case No. 17-16939 (RG)

Chapter 13

Judge: Rosemary Gambardella

Hearing Date: May 16, 2018

Hearing Time: 10:30 a.m.

**OPPOSITION TO MOTION FOR
RELIEF FROM AUTOMATIC STAY
FILED BY JPMORGAN CHASE
BANK, N.A.**

MAUREEN DEVINE does hereby certify and say that:

1. I am the Debtor in the above captioned matter and as such I am fully familiar with the facts herein.
2. I make this Certification in Opposition to the Motion for Relief from Automatic Stay filed by JPMorgan Chase Bank, N.A. ("Chase") pursuant to 11 U.S.C. §362.
3. The motor vehicle upon which Chase has a lien is a 2010 GMC Terrain (the "Vehicle") that I purchased on October 12, 2013 for \$25,307.28. I received a credit for a trade-in in the amount of \$4,433.67 and financed \$23,111.11 over a 66 month period. See

the New Jersey Retail Installment Contract attached as Exhibit "A" to the Chase Motion for Relief from Stay.

4. I disagree with the valuation submitted by Chase.

5. I believe the current value of the Vehicle is \$3,000 based on the Vehicle's current condition. Attached as **Exhibit "1"** is a Kelly Blue Book value of the car in the range between \$2,406 and \$3,945.

6. The Vehicle is eight (8) years old; has over 170,000 miles and is in fair condition.

7. I would like to resume making the car payments after the Court determines the pending motion to partially void the Chase lien and reclassify it as partially secured and partially unsecured (the "Motion") that is included within the pending Chapter 13 Plan scheduled for confirmation on June 6, 2018.

8. In light of the above, it is respectfully requested that the Court deny the motion for relief from stay and schedule an evidentiary hearing to determine the value of the Vehicle.

9. I certify under penalty of perjury that the foregoing is true and correct.

DATED: May 9, 2018

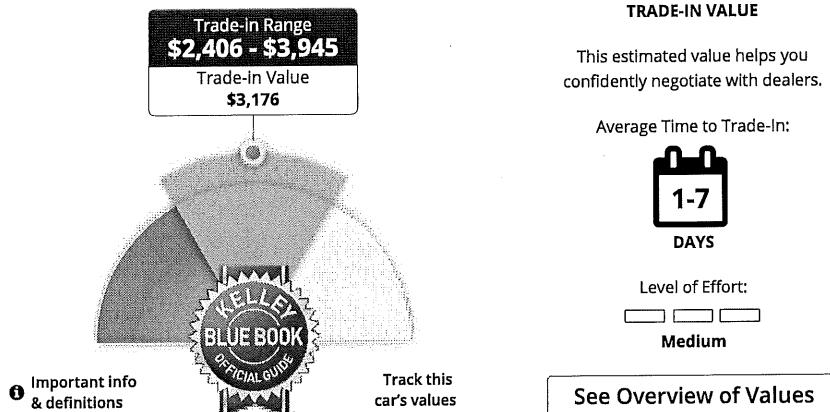
/s/Maureen Devine
MAUREEN DEVINE

EXHIBIT 1

5/8/2018

2010 GMC Terrain SLE Sport Utility 4D Trade In Values | Kelley Blue Book

Home > What's My Car Worth > Style > Options & Condition > SLE Sport Utility 4D



Condition: Good
Valid for ZIP Code 07821 through 05/10/2018

Overall Consumer Rating 7.7/10

☆☆☆☆☆ 317 Ratings

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2 Trade Up to a New Car

Based on a 20% down payment

2018 Honda CR-V

2018 Ford Edge

2018 Chevrolet Equinox

2018 Hyundai Santa Fe

\$310 per month

\$376 per month

\$313 per month

\$399 per month



Estimated monthly payments based on the Blue Book® Fair Purchase Price for 72 months at 3.19% APR, a 20% down payment and 6.5% for tax and license. Estimated rates and monthly payments do not represent offers to sell vehicles or provide financing.

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New

Similar Vehicles

Make



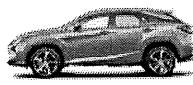
Model

2018 Hyundai Santa Fe Sport

Take a



Look



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